

EXHIBIT 1
EXCERPTED INTERROGATORIES TO X AND X's RESPONSES THERETO¹

INTERROGATORY NO. 1: Identify each server failure, server strain, or degraded user experience caused by logged-in or logged-off scraping, automated, inauthentic, anomalous, or unauthorized access during the relevant period between July 26, 2019 and the present.

X's Response to Interrogatory No. 1: X Corp. incorporates its General Objections and Qualifications as set forth above. X Corp. objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and not proportionate to the needs of this action. As X Corp. has explained during meet-and-confer discussions, manually identifying every server failure, strain, and user experience from July 26, 2019 to present would be unduly costly and prohibitively burdensome. X Corp. further objects to the extent it requires X Corp. to gather data not maintained in the ordinary course of its business. X Corp. further objects that this Interrogatory is premature because discovery is not yet complete.

Subject to and without waiving any objections, X Corp. does not always know when individual server failures, server strains, or degraded user experiences are due to scraping, automated, inauthentic, anomalous, or unauthorized access because those engaging in such conduct affirmatively conceal their acts (as Bright Data does). Further, X cannot comprehensively catalog such instances at this time because the information necessary to do so is in the possession, custody, or control of Bright Data and because Bright Data has yet to produce that information. Nonetheless, pursuant to Rule 33(d), X Corp. has produced the following documents that identify such instances:

- XCorp_000081179-XCorp_000081182
- XCorp_000082094-XCorp_000082097
- XCorp_000082098
- XCorp_000082099-XCorp_000082100
- XCorp_000082101-XCorp_000082108
- XCorp_000082109-XCorp_000082111
- XCorp_000082112-XCorp_000082113
- XCorp_000082114-XCorp_000082115
- XCorp_000082116-XCorp_000082118
- XCorp_000082119-XCorp_000082121

X Corp. will continue to supplement its Response, including in response to the production of necessary information by Bright Data.

¹ Excerpts include X's Responses and Objections to Bright Data's First Set of ROGs 1, 2 and 3.

INTERROGATORY NO. 2: Identify each server failure, server strain, or degraded user experience caused by logged-in or logged-off scraping, automated, inauthentic, anomalous, or unauthorized access by Bright Data or any Bright Data customer during the relevant period between July 26, 2019 and the present.

X's Response to Interrogatory No. 2: X Corp. incorporates its General Objections and Qualifications as set forth above. X Corp. objects to this Interrogatory because manually identifying every individual server failure, strain, or degraded user experience from July 26, 2019 to present due to Bright Data or its customers would be unduly costly and prohibitively burdensome. X Corp. further objects that Interrogatory No. 2 is a contention interrogatory that prematurely seeks information that will depend on forthcoming discovery and expert analysis. X Corp. further objects that it cannot reasonably identify or provide a response to Interrogatory No. 2 without additional information from Bright Data and its customers that X Corp. has requested from Bright Data, but not yet received in discovery. X Corp. further objects insofar as it requires X Corp. to gather data not maintained in the ordinary course of its business. X Corp. will supplement its Response, as appropriate, as discovery continues, if and when Bright Data produces adequate information to enable X Corp. to respond.

INTERROGATORY NO. 3: Identify each instance of logged-in scraping, automated, inauthentic, anomalous, or unauthorized access by Bright Data or any Bright Data customer during the relevant period between July 26, 2019 and the present.

X's Response to Interrogatory No. 3: X Corp. incorporates its General Objections and Qualifications as set forth above. X Corp. objects that the request in this Interrogatory to identify “each” instance of scraping, automated, inauthentic, anomalous, or unauthorized access is premature because discovery is not yet complete. X Corp. further objects that Interrogatory No. 3 is a contention interrogatory that prematurely seeks information that will depend on forthcoming discovery and expert analysis. X Corp. further objects that it cannot reasonably provide a response to Interrogatory No. 3 without additional information from Bright Data that X. Corp. has requested, but not yet received in discovery. X Corp. further objects insofar as it requires X Corp. to gather data not maintained in the ordinary course of its business. X Corp. will supplement its Response, as appropriate, as discovery continues, if and when Bright Data produces adequate information to enable X Corp. to respond.